

## LAW OFFICES OF DANIEL D. KIM

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New York, New York 10001

March 21, 2025

Via ECF

The Honorable Judge Laura T. Swain  
United District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: United States v. Hong Nan Yi, et al.  
Case No.: 18 Cr.882(LTS)

Dear Honorable Judge Swain:

Please be advised that this law firm represents Ms. Hong Nan Yi, who pled guilty to Count I (Money Laundering Conspiracy) pursuant to the United States Code, Sections 1956(a) (1) (A) (i).

On September 10, 2020, this Honorable Court sentenced Ms. Yi to 5 years of Probation as to Count One (1) with 24 months of home detention. (See Minute Entry dated 09/10/2020, following Docket Entry 209). In imposing that sentence, the Court recognized Ms. Yi's unique role as the sole caregiver for her disabled "sister," Yong Hwa Cho.

Since sentencing, Ms. Yi has complied fully with all terms of her probation. She has maintained full-time employment, consistently submitted monthly reports, and continued to care for her "sister" by attending all medical appointments. Her conduct has been exemplary. Indeed, during the COVID-19 pandemic, Ms. Yi's former probation officer recommended that she consider applying for early termination to conserve Department resources.

Ms. Yi's five-year probation term is currently set to conclude in less than six months. However, she now faces a deeply personal and time-sensitive situation. Ms. Cho's elderly mother in South Korea is gravely ill and not expected to live much longer. Ms. Yi seeks to accompany Ms. Cho to Korea so that Ms. Cho can see her mother one last time. In addition, because Ms. Cho is over 65 and suffers

from various medical issues, the trip would also allow her to receive traditional Korean herbal and medicinal treatments that may improve her quality of life.

Ms. Yi's current probation officer, Ms. Lisa Famularo, has confirmed her support for early termination, and Assistant U.S. Attorney Thane Rehn has advised that the government has no objection. Their confirmation emails, Exhibit "1," are attached for the Court's review.

18 U.S.C.A. §3583(e)(1) states, "The court may...terminate a term of supervised release and discharge the defendant released at any time after the expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure relating to the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant released and *the interest of justice*."

Ms. Yi has satisfied all financial obligations, complied fully with the terms of supervision, and continued to fulfill the caregiver role that this Court recognized as central to her sentencing.

Accordingly, we respectfully request that the Court grant early termination of Ms. Yi's probation so she may accompany Ms. Cho to South Korea during this critical time.

Thank you for Your Honor's attention to this matter and for your thoughtful consideration.

Respectfully submitted,

Law Offices of Daniel D. Kim

*Daniel D. Kim*

By: Daniel D. Kim, Esq.

The Court finds, pursuant to 18 U.S.C. section 3564(c), that early termination of Ms. Yi's term of probation, as imposed on September 10, 2020 (docket entry no. 210), is warranted by the conduct of Ms. Yi and in the interest of justice for the reasons stated above. The foregoing request is accordingly granted.

SO ORDERED.

March 24, 2025

/s/ Laura Taylor Swain, Chief USDJ

EXHIBIT 1



daniel kim <danielkimlaw@gmail.com>

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## Re: February 2025 Report

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**Lisa Famularo** <Lisa\_Famularo@nyep.uscourts.gov>

Tue, Mar 4, 2025 at 1:44 PM

To: daniel kim <danielkimlaw@gmail.com>

Cc: yi diane <diane0825@hotmail.com>, Christopher Lynn <Chrisrlynn@aol.com>

We would support as she meets the criteria.



*Lisa Famularo*

Supervisory U.S. Probation Officer

27 Johnson Street

Brooklyn, New York 11201

Phone: (631) 712-6355/347-534-3453

Email: [Lisa\\_Famularo@nyep.uscourts.gov](mailto:Lisa_Famularo@nyep.uscourts.gov)

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**From:** daniel kim <[danielkimlaw@gmail.com](mailto:danielkimlaw@gmail.com)>

**Sent:** Monday, March 3, 2025 6:07 PM

**To:** Lisa Famularo <[Lisa\\_Famularo@nyep.uscourts.gov](mailto:Lisa_Famularo@nyep.uscourts.gov)>

**Cc:** yi diane <[diane0825@hotmail.com](mailto:diane0825@hotmail.com)>; Christopher Lynn <[Chrisrlynn@aol.com](mailto:Chrisrlynn@aol.com)>

**Subject:** Re: February 2025 Report

### CAUTION - EXTERNAL:

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**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.



daniel kim <danieldkimlaw@gmail.com>

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**Re: Diane Yi; 18Cr 882**

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**Rehn, Nathan (USANYs)** <Nathan.Rehn@usdoj.gov>

Fri, Mar 14, 2025 at 4:04 PM

To: daniel kim <danieldkimlaw@gmail.com>

Cc: yi diane <diane0825@hotmail.com>, Christopher Lynn <Chrisrlynn@aol.com>

Hi Daniel,

We have no objection.

Thank you,

Thane Rehn

[Quoted text hidden]